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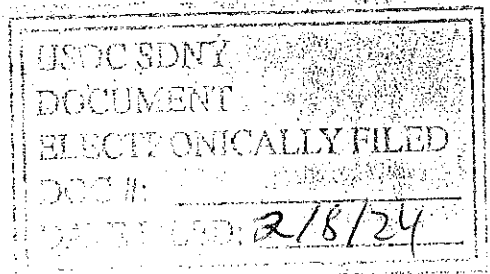o. 646.931.0011
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Granted

SO ORDERED

LEWIS A. KAPLAN USDJ

November 21, 2023

2/8/24

VIA ECF
Hon. Lewis A. Kaplan, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 21B
New Yor, New York 10007-1312

Re: **In re Customs and Tax Administration of the Kingdom of
Denmark (SKAT) Tax Refund Litigation
Master Docket No.: 1:18-md-02865-LAK-RWL**[1]

Dear Judge Kaplan:

My law firm represents individual Defendant, Matthew Tucci, and his associated pension plans in the below footnoted twenty-seven (27) individual actions within this MDL (collectively the "Tucci Defendants"). On today's date, my law firm will be filing a motion to withdraw as counsel for the Tucci Defendants in all of these actions. In support of this motion, we will be filing the Declaration of Joseph LoPiccolo, which contains sensitive recitations of communications between myself and Mr. Tucci that are protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Accordingly, I write to Your Honor at this time respectfully requesting the Court issue an Order permitting my law firm to file the Declaration of Joseph LoPiccolo under

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[1] This letter applies to the following actions: 1:18-cv-10028, 1:18-cv-10030, 1:18-cv-10031, 1:18-cv-10032, 1:18-cv-10035, 1:18-cv-10036, 1:18-cv-10039, 1:18-cv-10049, 1:18-cv-10060, 1:18-cv-10061, 1:18-cv-10062, 1:18-cv-10063, 1:18-cv-10064, 1:18-cv-10065, 1:18-cv-10066, 1:18-cv-10069, 1:18-cv-10070, 1:18-cv-10071, 1:18-cv-10073, 1:18-cv-10074, 1:18-cv-10076, 1:18-cv-10077, 1:18-cv-10080, 1:18-cv-10082, 1:18-cv-10083, 1:18-cv-10086 and 1:18-cv-10096.